MEMORANDUM

DATE: September 25, 1998

TO: Plastic Parts Surface Coating Survey Recipients

FROM: Bruce Moore, U.S. Environmental Protection Agency (EPA)

SUBJECT: Frequently Asked Questions (FAQ) Regarding the Plastic Parts Surface Coating Survey; Correction to Form B

The attachment summarizes the questions and issues discussed at the recent teleconference workshops held by EPA. The workshops were conducted to explain how the individual forms of the plastic parts surface coating survey are organized, to provide examples of responses that EPA is seeking, and to answer the survey recipients' questions.

Note that there is an error in Form B. All the data provided on Form B (especially items **B-2** material usage, **B-3** material composition, and **B-5** speciated components) should be on an "as supplied" basis. Item **B-3** incorrectly requests "as applied" data.

Because of multiple requests for extensions in returning the surveys, EPA has moved the due date to **November 16, 1998**.

PLASTIC PARTS SURFACE COATING INDUSTRY SURVEY
FREQUENTLY ASKED QUESTIONS

Version 1.0
Last Updated September 18, 1998

GENERAL

Do I have to fill out Enclosure 1, Enclosure 1a, or both?

You must fill out either Enclosure 1 or Enclosure 1a, but not both. Enclosure 1a is a generic industry survey designed to accommodate any facility. As a result, it contains many items that are not applicable to surface coating of plastic parts. Enclosure 1 is an alternative survey developed by EPA specifically for plastic parts surface coating. It is EPA's belief that Enclosure 1 will be easier for you to fill out because it is tailored to your industry.

How do I fill out the forms if all I use are adhesives?

Please treat your adhesives as a coating; fill out a Form B material data sheet for the adhesive, fill out a Form C control device form if applicable, and fill out Forms D through I to describe the application of the adhesive.

How do I mark confidential information on these forms?

At the bottom of each form is a place for you to identify the Confidential Business Information (CBI) included on each form. Check "all" if all the information on a given sheet should be treated as confidential. Check "some" if some of the information is confidential; you should then circle the confidential information itself. Check "none" if you are not claiming any of the data as confidential. Please refer to your cover letter and survey package for guidelines regarding CBI, and note that if you do not check a CBI box on a form, EPA will assume that the form contains no CBI.

Do I have to respond to these forms if I only apply color through a gel-coating process?

Gel coats will be regulated by the Reinforced Plastic Composites NESHAP and Boats NESHAP. However, any coating of the composite is of interest to EPA for possible regulation under the Plastic Parts and Products Coating NESHAP and is thus being requested by this survey. The EPA would also like to know which products are best manufactured with molded-in color (e.g., through use of pigmented gel coats), which require post-mold coatings, and the reasons why. Furthermore, EPA is seeking information on in-mold coatings, for example, in-mold lacquers on polyurethanes, and paint film laminates on thermoplastics--which products are suited to these technologies and reasons why. Thus, if you have considered coating your products in addition to using gel coats, please provide EPA with your reasons.

What is my facility tracking number?

Your facility tracking number was included on your cover letter and on the original envelope distributed by EPA. If you need to request your facility tracking number, please contact EPA's contractor for the project, Greg DeAngelo, Eastern Research Group, Inc., at gdeangel@erg.com. Please include with your request the name and full address of your facility along with your contact information.

What is the difference between venting to the building interior versus venting to the atmosphere?

This question applies to several items where the forms are asking about the fate of emission vent streams. If the vent stream is released inside the building, the assumption is that the vent stream will eventually be released to the atmosphere. By checking "vent to atmosphere," you are indicating that the vent stream is routed directly to the atmosphere.

Can I write additional details about my process in the margins of the forms?

Yes. We would prefer that you attach a Form J comment sheet to provide any additional details; however, for a short comment it may be easier and more convenient to add a note in the margin next to the appropriate question.

FORM A. GENERAL FACILITY INFORMATION

Which date do I put for my facility if I have gone through expansions, modifications, or ownership changes?

Please note the date of original construction of the facility. If you feel that it is important to provide a brief history of your facility, please use a Form J comment sheet.

Do you want me to identify all of the thousands of products I coat?

No. In item **A-6**, please list the groups of products that you coat, along with their Standard Industrial Classification (SIC) Code. You can group your products by SIC Code or by any other method you see is appropriate.

What if 1996 is not a representative year for my facility?

In item **A-7**, please indicate a representative year for your facility. If 1996 was unusual for some reason (for example, you spent 6 months off-line while a modification was being made), then provide a representative year and attach a Form J comment sheet explaining the situation.

FORM B. MATERIAL DATA

How do I fill out Form B for a multi-component coating?

As an example, consider a coating with a thinner and a catalyst that must be added prior to use. Complete a Form B for the thinner (material ID number MN100) and a Form B for the catalyst (MN200). Then, for the coating (MN300), under item **B-4**, indicate that thinner MN100 and catalyst MN200 are added (you can use the margins to indicate this). Also provide the typical thinning ratio, or (at worst case) a range of thinning ratios.

Can I just send you a spreadsheet or a printout with the data you are requesting?

No. It is essential for our data entry and quality control purposes that you fill out Form B. You may provide printouts if the format of the printout exactly matches that of Form B.

Can I group materials if the speciated components are not identical?

Yes. However, a group of materials or a group of coatings must still vary by no more than 5 percent in total HAP and no more than 5 percent in total VOC (weight percent). If the members of your group of coatings contain different speciated components, you must list all of the components that appear in the group of coatings; provide a volume-weighted average weight percent content for each component.

If I list ranges for my weight percent contents, my total is greater than 100 percent.

Although item **B-5** specifies that the sum of the speciated components must equal 100 percent, EPA recognizes that there are cases where that will not be possible. Ranges may cause the total to be greater than 100 percent, and your sources of data (even if they do not report ranges) may indicate a sum of speciated components greater than 100 percent.

FORM C. CONTROL DEVICES

How do I fill out Form C for a filter on a spray booth?

A filter on a spray booth (or any other method employed to capture particulate matter and overspray from a coating operation) is better handled on Form D. Item **D-4** provides a data column for you to identify the type of particulate matter or overspray control used in each of your spray booths. Form C should be used for any stand-alone, add-on control devices (for example, incinerators or carbon adsorbers).

FORM D. COATING SCENARIOS

What do I describe as flash-off, and what do I describe as curing?

Many operations will not have a dedicated flash-off area or zone separate from the curing area. Please indicate in either item **D-5** or **D-6** the conditions following the coating application. For

example, if a part cures for half an hour at room temperature in what is typically referred to as flash-off zone, indicate in either item that 30 minutes at "ambient" temperature is required. A note in the margin that you do not have a dedicated flash-off area would be helpful.

What do I do if I don't use a spray booth?

Item **D-4** should be more general. It asks for "spray booth description," but it should ask for "material application area description." Please provide a brief name or description for your coating application area under the "spray booth description." Attach a Form J comment sheet if you need to provide additional details.

FORM F. STORAGE

Which box do I check if I use tote tanks of different sizes than those listed?

In item **F-3**, you can check the box for the tote tank closest in size to your tote tanks. You can also check the box for "other" and provide the actual volume of the tote tank.

Do I have to provide storage tank parameters for a tote tank that is larger than 400 gallons?

No. The storage tank parameters question (item **F-4**) applies only to storage vessels larger than 400 gallons. These storage vessels are expected to have associated breathing losses, while large tote tanks are not.

FORM H. CLEANING OPERATIONS

How do I fill out Form H for a mascant clean-up spray?

One method of cleaning the interior of a spray booth is to use a spray-on, peel-off mascant coating. To note this on Form H, check "other" under item **H-3** and provide the annual usage of the material under item **H-4**. Note that to complete item **H-4**, you will need to create a Form B material data sheet for the mascant coating.

How do I fill out Form H for an incinerator I use to clean paint hooks?

Check "other" in item **H-3** and indicate briefly the type of cleaning operation. Also note the control device number (CD_____, from item **C-1**) if the incinerator is also used to control vent gases and you have already filled out a Form C for the incinerator. If the incinerator is only used in the cleaning operation, note this on the Form H, briefly describe the control device, and provide its control efficiency.